

**IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA**

JULI-ANN DEBARROS,	)	
	)	
Plaintiff,	)	CIVIL ACTION
	)	FILE NO.: 23-A-2914
v.	)	
	)	
HUEY LUEY'S ACWORTH, LLC,	)	
RICHARD STOLL, and	)	
JAMIE GLORE,	)	
	)	
Defendants.	)	

**NOTICE OF FILING PETITION FOR REMOVAL**

NOTICE IS HEREBY GIVEN that HUEY LUEY'S ACWORTH, LLC and RICHARD STOLL, Defendants in the above-styled action, on this date have filed their Petition for Removal in the Office of the Clerk of the United States District Court for the Northern District of Georgia, Atlanta Division. A copy of the Petition for Removal (without exhibits) is attached hereto as **Exhibit A.**

This 1<sup>st</sup> day of September, 2023.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/ Anandhi S. Rajan  
Anandhi S. Rajan  
Georgia Bar No. 592760

*Attorney for Defendants Huey Luey's  
Acworth, LLC and Richard Stoll*

1420 Peachtree Street, N.E.  
Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800  
[anandhi.rajana@swiftcurrie.com](mailto:anandhi.rajana@swiftcurrie.com)

**EXHIBIT "B"**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

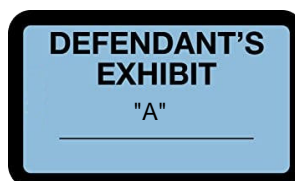
JULI-ANN DEBARROS,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION
v.	)	
	)	FILE NO. _____
HUEY LUEY’S ACWORTH, LLC,	)	[On removal from the State
RICHARD STOLL and	)	Court of Cobb County,
JAMIE GLORE,	)	Georgia, Civil Action
	)	File No. 23-A-2914]
Defendants.	)	

**PETITION FOR REMOVAL**

COME NOW, Defendants Huey Luey’s Acworth, LLC and Richard Stoll, and hereby file this their Petition for Removal of this action from the State Court of Cobb County, Georgia, wherein it now pends, to the District Court of the United States for the Northern District of Georgia, Atlanta Division, and show the Court as follows:

1.

On July 5, 2023, Plaintiff Juli-Ann DeBarros filed suit against Huey Luey’s Acworth LLC, Richard Stoll, and Jamie Glore in the State Court of Cobb County, Georgia, in an action styled *Juli-Ann v. Huey Luey’s Acworth, LLC, Richard Stoll, and Jamie Glore*, Civil Action No. 23-A-2914 (“State Court Action”). True and correct



copies of filings to date in the State Court Action are collectively attached hereto as **Exhibit “A.”**

2.

This action was filed by a Plaintiff who is alleged to be a citizen and resident of the State of Georgia. (Complaint, ¶ 5).

3.

Defendant Huey Luey’s Acworth, LLC is a domestic corporation existing under the State of Georgia with its principal place of business in the State of Georgia. Defendant Richard Stoll is a citizen and resident of the State of Georgia.

4.

The Complaint and Summons in the State Court Action were served upon Huey Luey’s Acworth, LLC on August 9, 2023, and Defendant Stoll was served on August 11, 2023. This Petition for Removal is filed within thirty days of these Defendants receiving the Complaint and, thus, notice of Plaintiff’s lawsuit. Under 28 U.S.C. § 1446(b)(1), a defendant may file a notice of removal “within thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based...” *See* 28 U.S.C. § 1446(b)(1).

5.

Plaintiff's Complaint against Defendants includes a claim by Plaintiff seeking to recover damages for alleged sexual harassment by Defendant Jamie Glore, in violation of Title VII, 42 USC § 2000 et seq. (Complaint, Count V.)

6.

This Court has jurisdiction over this Civil Action pursuant to 28 U.S.C. §§ 1331 and 1343 in that the Plaintiff has asserted claims arising under the Constitution or laws of the United States.

7.

Pursuant to 29 U.S.C. § 1441, et. seq., this action is removable to this Court.

8.

Pursuant to 28 U.S.C. § 1446(d), concurrently with the filing of this Notice, Defendant has given notice of this Petition for Removal to all parties on record and to the Clerk of the State Court of Cobb County, Georgia. A true and correct copy of the Notice of Filing Petition for Removal is attached hereto as **Exhibit "B."**

9.

Defendant Jamie Glore consents to the removal of this action to this Court, as set forth in his Consent to Removal, as required by 28 USC §1446, attached hereto as **Exhibit “C.”**

WHEREFORE, Defendants pray that this case proceed in this Court as a removed claim or cause of action under 28 U.S.C. 1331 et. seq.

This 1<sup>st</sup> day of September, 2023.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/ Anandhi S. Rajan  
Anandhi S. Rajan  
Georgia Bar No. 592760

*Attorney for Defendants Huey Luey's  
Acworth, LLC and Richard Stoll*

1420 Peachtree Street, N.E.  
Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800  
[anandhi.rajan@swiftcurrie.com](mailto:anandhi.rajan@swiftcurrie.com)

**LOCAL RULE 5.1C CERTIFICATION**

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1C.

This 1<sup>st</sup> day of September, 2023.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/ Anandhi S. Rajan  
Anandhi S. Rajan  
Georgia Bar No. 592760

*Attorney for Defendants Huey Luey's  
Acworth, LLC and Richard Stoll*

1420 Peachtree Street, N.E.  
Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800  
[anandhi.rajan@swiftcurrie.com](mailto:anandhi.rajan@swiftcurrie.com)

**CERTIFICATE OF SERVICE**

This is to certify that this day I have electronically filed this ***PETITION FOR REMOVAL*** with the Clerk of Court by e-filing same using the CM/ECF System, and served a copy of the foregoing electronically upon all parties of record via the CM/ECF System, to the following attorneys of record for the parties:

Nicholas Martin, Esq.  
Frank DeMelfi, Esq.  
Martin DeMelfi, LLC  
7000 Peachtree Dunwoody Road  
Building 1, Suite 202  
Atlanta, Georgia 30328  
[nmartin@martin-demelfi.com](mailto:nmartin@martin-demelfi.com)  
[fdemelfi@martin-demelfi.com](mailto:fdemelfi@martin-demelfi.com)

Justin B. O'Dell, Esq.  
O'Dell O'Neal Hungerford & Blanchard  
506 Roswell Street Suite 210  
Marietta, GA 30060  
[jbo@odelloneal.com](mailto:jbo@odelloneal.com)

This 1<sup>st</sup> day of September, 2023.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/ Anandhi S. Rajan  
Anandhi S. Rajan  
Georgia Bar No. 592760  
*Attorney for Defendants Huey Luey's  
Acworth, LLC and Richard Stoll*

1420 Peachtree Street, N.E., Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800  
[anandhi.rajan@swiftcurrie.com](mailto:anandhi.rajan@swiftcurrie.com)

4871-7148-5308, v. 1

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the within and foregoing **NOTICE OF FILING PETITION FOR REMOVAL** with the Clerk of Court via electronic transmission using Odyssey eFileGA and served a copy of the foregoing electronically upon all parties of record via Odyssey eFileGA, upon the following attorneys of record:

Nicholas Martin, Esq.  
Frank DeMelfi, Esq.  
Martin DeMelfi, LLC  
7000 Peachtree Dunwoody Road  
Building 1, Suite 202  
Atlanta, Georgia 30328  
[nmartin@martin-demelfi.com](mailto:nmartin@martin-demelfi.com)  
[fdemelfi@martin-demelfi.com](mailto:fdemelfi@martin-demelfi.com)

Justin B. O'Dell, Esq.  
O'Dell O'Neal Hungerford & Blanchard  
506 Roswell Street Suite 210  
Marietta, GA 30060  
[jbo@odelloneal.com](mailto:jbo@odelloneal.com)

This 1<sup>st</sup> day of September, 2023.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/ Anandhi S. Rajan  
Anandhi S. Rajan  
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*Attorney for Defendants Huey Luey's  
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Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800  
[anandhi.rajana@swiftcurrie.com](mailto:anandhi.rajana@swiftcurrie.com)